

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
WAYNE YOUNG	:	VIOLATIONS:
	:	21 U.S.C. § 841(a)(1) (possession with
	:	intent to distribute cocaine - 1 count)
	:	21 U.S.C. § 841(a)(1) (possession with
	:	intent to distribute marijuana - 1 count)
	:	18 U.S.C. § 924(c)(1) (possession of a
	:	firearm in furtherance of a drug
	:	trafficking offense - 1 count)
	:	18 U.S.C. § 922(g)(1) (convicted felon in
	:	possession of a firearm - 1 count)
	:	Notice of additional factors
		Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about November 24, 2004, at Philadelphia, in the Eastern District of
Pennsylvania, defendant

WAYNE YOUNG

knowingly and intentionally possessed with intent to distribute approximately 51 grams of a
mixture or substance containing a detectable amount of cocaine, a Schedule II controlled
substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 24, 2004, at Philadelphia, in the Eastern District
of Pennsylvania, defendant

WAYNE YOUNG

knowingly and intentionally possessed with intent to distribute approximately 330 grams of a
mixture or substance containing a detectable amount of marijuana, a Schedule II controlled
substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 24, 2004, at Philadelphia, in the Eastern District of Pennsylvania, defendant

WAYNE YOUNG

knowingly possessed a firearm, that is, one Talon Industries, Model T200 9mm pistol bearing serial number 04878, and one Raven, Model MP25 .25 caliber pistol bearing serial number 1098110, loaded with four rounds of ammunition, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with the intent to distribute cocaine and marijuana in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 24, 2004, at Philadelphia, in the Eastern District of
Pennsylvania, defendant

WAYNE YOUNG,

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, one Talon Industries, Model T200 9mm pistol bearing serial number 04878, and one Raven, Model MP25 .25 caliber pistol bearing serial number 1098110, loaded with four rounds of ammunition

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF ADDITIONAL FACTORS

THE GRAND JURY FURTHER CHARGES THAT:

1. In committing the offense charged in Count One of this indictment,
defendant **WAYNE YOUNG**:

- a. Committed an offense and relevant conduct involving more than
50 grams of cocaine, as described in U.S.S.G. § 2D1.1(a)(12)
- b. Committed an offense in which a dangerous weapon (including a
firearm) was possessed, as described in U.S.S.G. § 2D1.1(b)(1).

2. In committing the offense charged in Count Two of this indictment,
defendant **WAYNE YOUNG**:

- a. Committed an offense and relevant conduct involving more than
250 grams of marijuana, as described in U.S.S.G. § 2D1.1(a)(16).
- b. Committed an offense in which a dangerous weapon (including a
firearm) was possessed, as described in U.S.S.G. § 2D1.1(b)(1).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 924(c)(1) and 922(g)(1) set forth in Counts Three and Four of this indictment, the defendant

WAYNE YOUNG

shall forfeit to the United States of America the firearms and ammunition involved in the commission of these offenses, including, but not limited to:

- (A) One Talon Industries, Model T200 9mm pistol bearing serial number 04878, and
- (B) One Raven, Model MP25 .25 caliber pistol bearing serial number 1098110, loaded with four rounds of ammunition.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney